### ORAL ARGUMENT SCHEDULED FOR NOVEMBER 4, 2024 No. 21-5166

# In the United States Court of Appeals for the District of Columbia Circuit

LOPER BRIGHT ENTERPRISES, INC., et al.,

Plaintiffs-Appellants,

v.

GINA RAIMONDO, in her official capacity as Secretary of Commerce, et al.,

Defendants-Appellees.

On Remand from the Supreme Court of the United States

MOTION OF RELENTLESS INC., HUNTRESS INC. AND
SEAFREEZE FLEET LLC
FOR LEAVE TO FILE AS AMICI CURIAE IN SUPPORT OF
PLAINTIFFS-APPELLANTS

John J. Vecchione

Counsel of Record

New Civil Liberties Alliance
4250 N. Fairfax Dr., Ste. 300

Arlington, VA 22203
(202) 869-5210

john.vecchione@ncla.legal

Counsel for Amici Curiae

#### CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1, the undersigned counsel states that Amici Relentless Inc., Huntress Inc., and Seafreeze Fleet LLC provide the following disclosure statement. Amici Relentless Inc. and Huntress Inc. are wholly owned by Amicus Seafreeze Fleet LLC. Amicus Seafreeze Fleet is a limited liability company with no parent corporation, and no publicly held corporation holds 10% or more of its stock.

<u>/s/ John J. Vecchione</u> John J. Vecchione

## STATEMENT REGARDING CONSENT TO FILE AND SEPARATE BRIEFING

All parties have consented to the filing of this brief.\* Pursuant to Circuit Rule 29(d), NCLA certifies that a separate brief is necessary to provide the Court with an analysis of the Magnuson Stevens Act particularly the 1990 amendments in the absence of the *Chevron* doctrine.

Respectfully submitted,

/s/ John J. Vecchione
John J. Vecchione
Counsel of Record
NEW CIVIL LIBERTIES ALLIANCE
4250 N. Fairfax Dr., Ste. 300
Arlington, VA 22203
(202) 869-5210
john.vecchione@ncla.legal

Dated: September 4, 2024

<sup>\*</sup> NCLA states that no counsel for a party authored this brief in whole or in part; and that no person or entity, other than NCLA and its counsel, made a monetary contribution intended to fund the preparation and submission of this brief. *See* Fed. R. App. P. 29(c)(5).

#### CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sent notification of such filing to all counsel of record. Furthermore, I caused 8 paper copies of the foregoing to be sent to the Clerk of this Court on the day of electronic filing.

/s/ John J. Vecchione John J. Vecchione